

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

DSS TECHNOLOGY MANAGEMENT,	)	
INC.	)	
	)	CIVIL ACTION NO. 6:15-CV-692
Plaintiff,	)	
	)	JURY TRIAL DEMANDED
v.	)	
	)	
QUALCOMM INCORPORATED.	)	
	)	
Defendant.	)	
	)	
	)	
	)	

**DECLARATION OF JOHN SNEAD**

I, John Snead, declare as follows:

1. My name is John Snead. I am over the age of twenty-one and am competent to make this declaration. I have personal knowledge of the facts contained herein, which are true and correct, and if called upon as a witness I could and would testify to their truth.

2. I am currently employed by Qualcomm Incorporated ("Qualcomm") at its corporate headquarters in San Diego, California. Qualcomm Technologies, Inc. ("QTI"), is a wholly owned subsidiary of defendant Qualcomm.

3. My title is Senior Manager, IT.

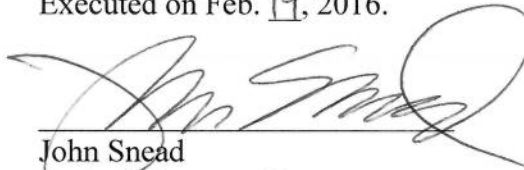
4. I understand that plaintiff DSS Technology Management, Inc. ("DSS") has alleged, among other things, that Qualcomm infringes U.S. Patent No. 5,965,924 and U.S. Patent No. 6,784,552 which allegedly relate to details regarding the structure resulting from the 20 or 28 nanometer process node employed to create the accused devices.

5. Qualcomm and QTI are Delaware corporations that have their principal places of business in San Diego, California. They maintain the vast majority of their respective relevant documents, computers, servers, and employees in San Diego, California and Las Vegas, Nevada, including documents, employees, and information relating to the marketing, sourcing, licensing, accounting, shipping, and sales of Qualcomm-branded chip products.

6. Reiner Klement, Rajiv Gupta, Dan Gyokery, Will Wyatt, Alex Tobi, and Maria Yantz are employed by Qualcomm or QTI. Each of these employees work in Qualcomm's San Diego, California headquarters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Feb. 19, 2016.

A handwritten signature in black ink, appearing to read "John Snead", written over a horizontal line.

John Snead  
Senior Manager, IT  
Qualcomm Incorporated